

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
-vs-) No. CR-24-316-R
)
CHANG ZHANG,) Violations: 21 U.S.C. § 846
) 21 U.S.C. § 853
Defendant.)
)

SUPERSEDING INFORMATION

The United States Attorney charges:

COUNT 1
(Drug Conspiracy)

On or about March 22, 2024, in the Western District of Oklahoma,

----- CHANG ZHANG -----

knowingly and intentionally conspired, combined, confederated, and agreed with others to interdependently possess with intent to distribute and distribute 50 kilograms or more of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

FORFEITURE

The allegation contained in this Superseding Information is hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1 of this Superseding Information, **CHANG ZHANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

The property subject to forfeiture includes, but is not limited to:

1. real property located at 1900 Lowry Avenue, Oklahoma City, Oklahoma 73129; fully described as; Lot Five (5), Block Two (2), of Oklahoma Industrial Park, and Addition to the City of Oklahoma City, Oklahoma County, Oklahoma, according to the recorded plat thereof; and
2. \$37,720.00 in funds held in First Enterprise Bank account number XXXX1230.

All pursuant to Title 21, United States Code, Section 853.

ROBERT J. TROESTER
United States Attorney

Elizabeth M. Bagwell
ELIZABETH M. BAGWELL
Assistant United States Attorney